

below and, in support thereof, states as follows:

1. On December 2, 2020, Plaintiffs filed a complaint in the Seventh Judicial District Court of the State of Utah, Grand County, Case No. 200700066.
2. Defendant A-1 was served with a Summons and the Complaint on December 3, 2020.
3. Defendant Moab Valley HealthCare, Inc. (“Moab”) was served with a Summons and the Complaint on December 5, 2020.
4. Moab consents to the removal of this action to this Court. *See, e.g.*, Notice of Consent to Removal, attached hereto as Exhibit A.
5. Defendant A-1 will give written notice of the filing of this Notice of Removal to all parties as required by 28 U.S.C. § 1446(d) and will file a copy of this Notice of Removal with the Seventh Judicial District Court in and for Grand County, State of Utah, as further required by that Section.
6. This Court has original subject matter jurisdiction over this pursuant to 28 U.S.C. § 1331, inasmuch as the Complaint purports to assert claims under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq.
7. Venue is proper in this Court because the action is being removed from the Seventh Judicial District Court in and for Grand County, State of Utah.
8. Because the Complaint was filed on December 2, 2020, and A-1 was served with the Summons and Complaint on December 3, 2020, this notice is timely filed under 28 U.S.C. § 1446(b).
9. Pursuant to the provision of 28 U.S.C. § 1446, a copy of this Notice of Removal is being filed with the Clerk of the Seventh Judicial District Court, Grand County, State of Utah.

10. A copy of all the Summons and Complaint served on A-1 are attached hereto as Exhibit B.

11. The undersigned counsel for A-1 has read the foregoing and signs the Notice of Removal pursuant to Rule 11 of the Federal Rules of Civil Procedure, as required by 28 U.S.C. § 1446(a).

WHEREFORE, Defendant A-1 prays that the above action now pending against it in the Seventh Judicial District Court in and for Grand County, State of Utah be removed to this Court.

DATED this 30th day of December, 2020.

PRICE PARKINSON & KERR, PLLC

/s/ Ronald F. Price

Ronald F. Price

*Attorneys for Defendant A-1 Collection
Agency, LLC*

CERTIFICATE OF SERVICE

I certify that on the 30th day of December, 2020, a copy of the foregoing **NOTICE OF REMOVAL** was served via email and United States Mail, postage fully prepaid, to the following:

Daniel M. Baczynski
BACZYNSKI LAW, PLLC
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Draper, UT 84020
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/s/ Ronald Price

Ronald Price